

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROADGET BUSINESS PTE. LTD., a private limited company organized in the country of Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE A HERETO

Defendants.

CIVIL ACTION NO. 1:23-cv-17036

Judge: Hon. Sara L. Ellis

**DEFENDANTS' UNOPPOSED MOTION
FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

1. Pursuant to Local Rule 26.2, Defendant Nos. 3, 4, 9, 10, 13–19, 21–23, 25, and 26 listed on Schedule A of the Complaint (“Defendants”), respectfully move for leave to file under seal sensitive information submitted with Defendants’ Opposed Motion to Dismiss. In support of its Motion, Defendants state the following:

2. On January 11, 2024, this Court granted Plaintiff’s *ex parte* request for a Temporary Restraining Order against Defendants, and Plaintiffs’ *ex parte* Motions to Seal Plaintiff’s Complaint and Memorandum in support of the Temporary Restraining Order (ECF Nos. 6, 13, 18). The information subject to sealing remains sealed pursuant to Plaintiff’s Motions.

3. Good cause exists to allow the filing of Exhibit A to the Haoyi Chen Declaration and the Declarations of Zhang Xue, Kong Dongfeng, Xu Haipeng, and Liu Sajun under seal, and to allow redaction of references to the data contained therein.

4. The information is currently subject to a sealing order requested by Plaintiff. *See* ECF No. 18 (granting Plaintiff's motion to seal, including names of defendant merchants, the accused products, and the copyrights at issue). Therefore, Defendants are requesting sealing of information that identifies or provides an indication of such information that is already subject to sealing by the Court's order.

5. Accordingly, Defendants respectfully request that the Court grant leave for Defendants to file Exhibit A the Haoyi Chen Declaration and the Declarations of Zhang Xue, Kong Dongfeng, Xu Haipeng, and Liu Sajun under seal, and to redact references to such data and information referenced within the Memorandum in Support Defendants' Motion to Dismiss.

6. Defendants are simultaneously filing a redacted public version of their sealed Memorandum.

Local Rule 37.2 Certification

On February 14-15, 2024, counsel for the parties met and conferred and counsel for Plaintiff does not oppose this motion.

Dated: February 15, 2024

Respectfully Submitted,

/s/ Christopher J. Fahy

Christopher J. Fahy
ARCH & LAKE LLP
203 N. LaSalle St., Ste. 2100
Chicago, IL 60601
Phone: 312-558-1369
Fax: 312-614-1873
Christopher@archlakelaw.com

Counsel for Defendants

Haoyi Chen
ARCH & LAKE LLP
2500 Wilcrest Dr.
Houston, Tx 77042
Phone: 346-335-9870
Fax: 312-614-1873
haoyichen@archlakelaw.com

*Counsel for Defendants
Pro hac vice forthcoming*

William W. Flachsbart
DUNLAP BENNETT & LUDWIG
333 N. Michigan Ave. Suite 2700
Chicago, Illinois 60601
Phone: 312-551-9500
wflachsbart@dbllawyers.com

Counsel for Defendants